

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
(EASTERN DIVISION)**

In re:

Women's Apparel Group, LLC,

Debtor.

Craig Jalbert, as Liquidating Trustee of the
Women's Apparel Group Liquidating Trust,

Plaintiff,

v.

MC2 Model Management LLC,

Defendant.

Case No. 11-16217 (JNF)

Chapter 11

Adv. No. 13-01273

**MOTION (ASSENTED TO) TO EXTEND TIME
FOR DEFENDANT TO ANSWER COMPLAINT**

Craig Jalbert, as Liquidating Trustee of the Women's Apparel Group Liquidating Trust (the "Plaintiff") respectfully requests that the time within which MC2 Model Management LLC (the "Defendant") may answer, move, or otherwise plead to the *Complaint to Avoid Transfers Pursuant to 11 U.S.C. §§547, 548, 549 and 502 and to Recover Property Transferred Pursuant to 11 U.S.C. §550* (the "Complaint") [Docket No. 1] is hereby extended to and including September 11, 2013. As grounds for this request, Plaintiff and Defendant have been in communication regarding a potential resolution of the Adversary Proceeding and request additional time to facilitate discussions regarding the same.

WHEREFORE, Plaintiff respectfully requests the entry of an Order:

1. extending the time within which Defendant may answer, move or otherwise plead to the Complaint; and
2. for such other and further relief as the Court deems just and proper.

Joan M. Feeney